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Attorneys for Defendants  
UNITED HEALTHCARE INSURANCE COMPANY  
and UNITED BEHAVIORAL HEALTH

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DAVID AND NATASHA WIT, on behalf  
of themselves and all others similarly  
situated, and BRIAN MUIR, on his own  
behalf and on behalf of all others similarly  
situated,

Plaintiffs,

v.

UNITED HEALTHCARE INSURANCE  
COMPANY and UNITED BEHAVIORAL  
HEALTH (operating as OPTUMHEALTH  
BEHAVIORAL SOLUTIONS),

Defendants.

Case No. 3:14-CV-02346-JCS

**DECLARATION OF NATHANIEL P.  
BUALAT IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF AND  
EXHIBITS TO THE DECLARATIONS OF  
JENNIFER D. THOMPSON KINBERGER  
AND JANE E. STALINSKI**

Judge: Hon. Joseph Spero  
Courtroom: G

Action Filed: May 21, 2014

1 I, Nathaniel P. Bualat, declare and state as follows:

2 1. I am an attorney licensed to practice before all of the courts of the State of  
3 California and have been admitted to practice before this Court. I am a Counsel with the law firm  
4 of Crowell & Moring LLP, counsel of record for defendants United Healthcare Insurance  
5 Company and United Behavioral Health (collectively, "Defendants"), the two defendants in this  
6 action. I am one of the Crowell & Moring LLP attorneys responsible for the day-to-day  
7 management of this action. I have personal knowledge of the facts set forth herein.  
8

9 2. Defendants request that the following materials, among others, be filed under seal:

- 10 a. Portions of the Declaration of Jennifer D. Thompson Kinberger in Support of  
11 Defendants United Healthcare Insurance Company and United Behavioral  
12 Health's Motion to Transfer Venue under 28 U.S.C. § 1404(a) ("Kinberger  
13 Declaration"), as identified with highlighting in the versions submitted to the  
14 Court;  
15
- 16 b. Exhibits 1-3 to the Kinberger Declaration in their entirety;
- 17 c. Portions of the Declaration of Jane E. Stalinski in Support of Defendants  
18 United Healthcare Insurance Company and United Behavioral Health's  
19 Motions to Transfer Venue under 28 U.S.C. § 1404(a), to Dismiss, and to Seal  
20 ("Stalinski Declaration"), as identified with highlighting in the versions  
21 submitted to the Court; and  
22
- 23 d. Exhibits 5-6 of the Stalinski Declaration in their entirety.

24 3. The content to be sealed in the materials identified above consist of personal  
25 information and protected health information relating to Plaintiffs David Wit, Natasha Wit and/or  
26 Brian Muir, including health information, addresses, dates of birth, health plan identification  
27  
28

1 numbers, healthcare medical record and claim numbers, social security numbers, and phone  
2 numbers.

3 4. To my knowledge, Defendants have never disclosed this information publicly, at  
4 all times maintaining its confidentiality.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed this 18th day of July, 2014, at San Francisco, California.

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8  
9 /s/ Nathaniel P. Bualat  
10 NATHANIEL P. BUALAT

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